

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

DAVID MANUEL ARRELLANO,

Plaintiff,

v.

GREAT LAKES EDUCATIONAL LOAN
SERVICES, INC.,

Defendant.

Case No: 5:19-cv-00094-H

PLAINTIFF’S MOTION TO PROCEED WITHOUT LOCAL COUNSEL

NOW COMES DAVID MANUEL ARRELLANO (the “Plaintiff”), through undersigned counsel, moving to proceed without local counsel. In support thereof, Plaintiff states as follows:

1. On May 23, 2019, Plaintiff filed his Complaint against Great Lakes Education Loan Services for violation of the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227 et seq. [Doc. 1].

2. On December 16, 2019, NOTICE of Attorney Appearance by Nayeem Nur Mohammed on behalf of Plaintiff was filed. [Doc. 16].

3. LR 83.10 states, in part:

a. **Local Counsel Required.** Unless exempted by LR 83.11, local counsel is required in all cases where an attorney appearing in a case does not reside or maintain the attorney’s principal office in this district. “Local counsel” means a member of the bar of this court who resides or maintains the attorney’s principal office in this district and whose residence or principal office is located within 50 miles of the courthouse in the division in which the case is pending. Attorneys desiring to proceed without local counsel must obtain leave from the presiding judge.

b. **Duties of Local Counsel.** Local counsel must be authorized to present and argue a party’s position at any hearing called by the presiding judge. Local counsel must also be able to perform, on behalf of the party

represented, any other duty required by the presiding judge or the local rules of this court.

4. Mr. Mohammed is located in Lewisville, Texas.
5. Mr. Mohammed is admitted to practice in this district.
6. Mr. Mohammed regularly practices in this district.
7. Although located outside of this district, Mr. Mohammed is willingly available to appear in-person with proper notice, should the Court require.
8. Plaintiff, a consumer, requests to proceed with local counsel to keep expense of retaining additional counsel at minimum.
9. As this action involves an individual consumer, deference should be provided to keep expenses to minimum.

WHEREFORE, Plaintiff, DAVID MANUEL ARRELLANO, requests the Court permit Plaintiff to proceed without local counsel; and grant such other relief as the Court deems just and proper.

DATED: December 31, 2019

Respectfully submitted,

DAVID MANUEL ARRELLANO

By: /s/ Joseph S. Davidson

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CERTIFICATE OF CONFERENCE

On December 31, 2019, I conferenced with Defendant's lead counsel, Mark W. McBrayer, by e-mail regarding relief sought herein. Mr. McBrayer is unopposed to this Motion.

CERTIFICATE OF SERVICE

I hereby certify that on December 31, 2019, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Joseph S. Davidson